

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 16 CV 3345

JENNY RAMGOOLIE

Plaintiffs,

-against-

ANDY RAMGOOLIE,

Declaration

Defendant.

ANDY RAMGOOLIE, hereby declares under penalties of perjury that the foregoing is true and correct:

1. I am the Defendant in the within Action. I am a resident of the State of New York and a citizen of the United States of America.
2. I have reviewed Plaintiff's motion dated February 27, 2019.
3. In response to Plaintiff's further request for damages discovery, I searched my records again in an attempt to produce AANDCO bank statements between 2014 and 2016.
4. Additionally, upon receiving a copy of the Court's opinion and Order, I requested the records from the Banks and the accountant Ramdass. I also made several calls to Trinidad, in a further attempt to procure the additionally requested damage discovery documents. I also emailed with AANDCO people in Trinidad, to try to identify and/or locate the relevant banks, sought by Plaintiff and identified in the Court's January 29, 2019 Opinion and Order. (See Exhibit 1 annexed hereto).
5. Furthermore, even though I hadn't been ordered to specifically contact Direct Med directly, I do so anyhow. (Annexed hereto as Exhibit 3 is an email response I received from Direct Med's attorney).

6. I forwarded all records I searched for and received from those entities to my attorney on February 12, 2019. (A copy of these voluminous records, are annexed hereto as Exhibit 3).

7. Upon information and belief, my attorney forwarded the supplementary damage discovery records to Plaintiff's attorney on February 13, 2019 (the very next day).

8. In response to Plaintiff's assertion in her Motion concerning another bank account in Trinidad for AANDCO ending in 451; I again had forwarded that to Trinidad and I have been informed that no such account exists and that what was produced in response was all that they possess. (See Exhibit 1).

9. In response to Plaintiff's further request for "financial records" AANDCO's accountant relied upon in his letter of October 6, 2016; I also requested of Mr. Ramdass for those documents. Everything that was given was produced in Exhibit 3.

10. In response to "business dealing between KDR and Direct Med"; I have no knowledge, control, records, or access of these foreign entities. (Exhibit 2 is the response I received from Direct Med's attorney).

11. In conclusion, I searched through all my records. I contacted and followed up with third-parties in Trinidad. Anything that could be located, or that was provided to me by the third-parties has been turned over to my attorney, to provide to plaintiff.

12. I have no other records in my possession, other than what has been provided.

13. I believe that I am in full compliance with this Court's Order of January 29, 2019.

Executed on March 29, 2019

A handwritten signature in black ink, consisting of a stylized 'A' followed by several horizontal strokes, positioned above a solid horizontal line.

ANDY RAMGOOLIE